

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
ONE HUNDRED THOUSAND DOLLARS)
(\$100,000.00) U.S. CURRENCY,)
SIXTEEN THOUSAND, FOUR HUNDRED)
SEVENTY-FIVE DOLLARS (\$16,475.00))
U.S CURRENCY,)
THIRTY-ONE THOUSAND, TWO HUNDRED)
NINETY-EIGHT DOLLARS (\$31,298.00))
US CURRENCY, and)
ELEVEN THOUSAND, FIVE HUNDRED)
FIFTEEN DOLLARS (\$11,515.00) U.S.)
CURRENCY, IN LIEU OF ASSORTED)
GAMBLING CHIPS,)
Defendants.)

VERIFIED COMPLAINT OF FORFEITURE

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.

2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), Title 18, United States Code, Section 981, and Title 21, United States Code, Section 881. *In Rem* jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355 & 1395 and Title 21, United States Code, Section 881(j).

3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code, Section 801 et seq., was proceeds traceable to such an exchange, and was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was criminally derived property involved in monetary and/or financial transactions to promote unlawful activity and conceal or disguise the nature, location, source, ownership, control of the proceeds in violation of Title 18, United States Code, Sections 1956 and 1957. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Sections 881(a)(4) and 881(a)(6) and Title 18, United States Code, Section 981(a)(1)(A).

5. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

6. On or about July 29, 2014, the defendant currency was seized from Peter Brooks and Robert Brooks by the Drug Enforcement Administration. The defendant currency is more particularly described as follows:

- a) \$100,000.00 U.S. Currency;

- b) \$16,475.00 U.S. Currency;
- c) \$31,298.00 U.S. Currency, and
- d) \$11,515.00 U.S. Currency, in lieu of assorted gambling chips.

7. The plaintiff alleges the defendant property is subject to forfeiture and for its reasons states as follows:

8. An investigation conducted by the Drug Enforcement Administration has identified several individuals involved in the manufacture and distribution of synthetic drugs in and around the St. Louis metropolitan area. During this investigation, investigators identified Peter Brooks as a member of the distribution organization.

9. Investigators have utilized source information, law enforcement surveillance operations, statements made by individuals as part of this investigation, and other investigative procedures to identify the extent of Peter Brooke's involvement in the drug trafficking enterprise.

10. Since November, 2013, the Drug Enforcement Administration has been investigating Peter Brooks. Peter Brooks is the owner of Area 51 Gifts and Novelties (Area 51) located at 6925 Gravois Avenue, St. Louis, Missouri. This business is a known distributor of smokable synthetic cannabinoid products which contain Schedule I controlled substance and/or analogues of Schedule I controlled substances. Several undercover purchases of smokable synthetic cannabinoids and drug paraphernalia have been made from Area 51.

11. On July 29, 2014, a federal search warrant was executed at Area 51. During the search agents discovered and seized approximately 464 grams of smokable synthetic cannabinoids and \$31,298.00 U.S. Currency.

12. On July 29, 2016, a federal search warrant was executed at a residence owned by Peter Brooks and solely occupied by Robert Brooks (Peter Brooks brother), located at 419 Fassen Street,

St. Louis, Missouri. During the search agents discovered and seized approximately 4.5 kilograms of smokable synthetic cannabinoids. Robert Brooks is employed at Area 51 and was at Area 51 at the time of the search. During the search, a locked safe was located in the closet of the master bedroom. Robert Brooks was called and voluntarily provided the combination. Investigators opened the safe and found a safe deposit box key located within the safe. Investigators drove to Area 51 and received consent from Robert Brooks to access the safe deposit box #47 at First Bank. Robert Brooks accompanied investigators to First Bank and provided access to the safe deposit box. Located within the safe deposit box were five yellow office envelopes containing approximately \$100,000.00 U.S. currency. Robert Brooks stated that the currency belonged to his brother Peter Brooks.

13. On July 29, 2016, a federal search warrant was executed at the residence of Peter Brooks located at 6395 Towne Woods Drive, St. Louis, Missouri. During the search agents discovered and seized various casino gambling chips from Ameristar Casino (\$8,500.00) and Lumiere Place (\$3,015.00) valued at \$11,515.00. On July 31, 2014, investigators transported the casino gambling chips to Ameristar Casino and Lumiere Place casino where they were converted into cashier's checks.

14. On July 29, 2016, a federal search warrant was executed at the residence of Peter Brooks and Rachel Lea Brooks. During the search agents located and seized approximately \$16,475.00 U.S. currency.

15. The only people known to have a possible interest in the defendant currency are Peter Brooks, Rachel Lea Brooks and Robert Brooks.

16. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, section 981 and Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant currency and the defendant currency be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Dated: March 1, 2016

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ Stephen Casey

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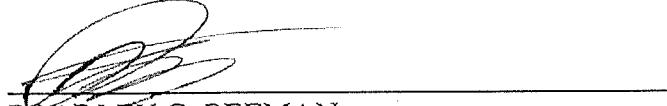
VERIFICATION

I, Bradley C. Beeman, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the United States Drug Enforcement Administration, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Drug Enforcement Administration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3-1-16
(date)



BRADLEY C. BEEMAN
Task Force Officer
Drug Enforcement Administration